

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KENNETH GERALD KNABENSHUE,)
AIS#241248)

Plaintiff,)

v.)

) Case No. 2:08-cv-0802-RDP-RR

RICHARD ALLEN, et al.,)

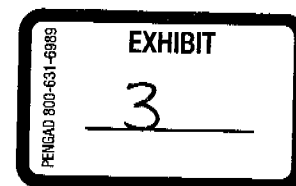
Defendants.)

AFFIDAVIT

Before me, the undersigned authority, a Notary Public, in and for said County and State of Alabama at large, personally appeared Roderick Gadson, who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Roderick Gadson. I am currently employed with the Alabama Department of Corrections as a Correctional Officer at W.E. Donaldson Correctional Facility, 100 Warrior Lane, Bessemer, Alabama 35023.

On March 22, 2008, at approximately 5:00 p.m., I, Officer Roderick Gadson, was a member of a cell extraction team. The inmate that was to be extracted was Kenneth Knabenshue, W/241248. I, Officer Gadson, was assigned as the shield man. Inmate Knabenshue refused several times to come to the door to have handcuffs placed on him. I, Officer Gadson, entered inmate Knabenshue cell. Inmate Knabenshue was very combative and immediately kicked the shield with so much force he broke the battery pack thereby rendering the stun shield useless. I, Officer Gadson, repeatedly attempted to



control inmate Knabenshue by pinning him up against the wall with the shield, at which time the remainder of the extraction team entered the cell behind me. The cell was filled with smoke due to a fire that inmate Knabenshue had set. Inmate Knabenshue was then removed from the cell during which time he continued to be combative.

To the best of my knowledge, the aforementioned facts are correct and true. I deny violating inmate Knabenshue's constitutional or civil rights.

Roderick Gadson

RODERICK GADSON

STATE OF ALABAMA)

JEFFERSON COUNTY)

SWORN TO AND SUBSCRIBED BEFORE ME AND GIVEN UNDER MY HAND
AND SEAL THIS 28th DAY OF AUGUST 2008.

Patricia H. Gerson

NOTARY PUBLIC

my Commission Expires

5/31/2012